

ATTACHMENT A TO POLICY 0730

WHISTLEBLOWER POLICY

The United States Pony Clubs, Inc. (USPC) expects its members, volunteers, associates, and officers and leaders at all levels to observe high standards of business and personal ethics in the conduct of their duties and responsibilities on behalf of USPC and to comply with all applicable laws and regulations. Further, USPC expects its officers and leaders at all levels, and encourages all other interested parties, to report violations of applicable laws or regulations and all ethics violations or suspected violations, including actual or suspected fraudulent financial reporting, or misappropriation of assets, in accordance with this Whistleblower Policy.

The intent of the USPC Whistleblower Policy is to enable all interested parties in USPC to raise serious concerns within USPC prior to seeking resolution outside the organization. Violations or suspected violations may be submitted on a confidential basis or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate inquiry or investigation. **While any such inquiry/investigation is in progress, no documents relating to the inquiry/investigation shall be destroyed or discarded by any leaders, officers, or employees of USPC.**

USPC expects transparent governance and “open door” environment at all levels and aspects of the organization, within the legal and regulatory statutes and in keeping with “best practices” of non-for-profit organizations. USPC expects that all interested parties in USPC will share their concerns, suggestions, or complaints with any individuals empowered to address them properly. In most cases, the local Club or Center leader or Regional Council member is in the best position to address an area of concern. However, if interested parties are not comfortable describing or relating a concern to a local or Regional leader or officer, or the interested parties are not satisfied with the response at that engagement level, then interested parties are encouraged to direct concerns to either the Executive Director, at the National Officer, or, to the President of the Board of Governors. While initial communication of concerns may be in any form, the inquiry/investigation may require additional documentation.

Interested parties that address any concerns regarding a violation or suspected violation is assumed by USPC to be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. However, any allegations which prove to have been made maliciously or knowingly to be false will be viewed as a serious offense and will be managed in accordance with appropriate policy guidelines.

No interested parties, who in good faith report a violation of applicable law or regulation or an ethics violation, shall suffer harassment, retaliation, or adverse employment action based on their reporting. Any local or Regional leader or officer, Board member, or USPC employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of duty or employment.

Parties wishing to direct concerns to the Executive Director or President may do so by email:

Executive Director: executivedirector@ponyclub.org

USPC President: president@ponyclub.org